

BWB:MTK
F.#2015R01077

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

DANIEL USKOKOVIC,

Defendant.

-----X

THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. **CR 15 - 351**
(T. 18, U.S.C., §§ 2252(a)(2),
2252(a)(4)(B), 2252(b)(1),
2252(b)(2), 2253 and 3551 et
seq.; T. 21, U.S.C., § 853(p))

CHEN, J.

LEVY, M.J.

COUNT ONE
(Receipt of Child Pornography)

1. In or about and between August 2014 and May 2015, within the Eastern District of New York, the defendant DANIEL USKOKOVIC did knowingly and intentionally receive one or more visual depictions, to wit, the images depicted in the following computer files: (a) 0_webcam mommy and daughter 5 yo.mp4; and (b) (g)super-girl 9yo and man.avi, using a means and facility of interstate and foreign commerce, and which visual depictions had been mailed, and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

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EASTERN DISTRICT
OF NEW YORK

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U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

CR 15-351

CHEN, J

LEVY, M.J.

COUNT TWO
(Possession of Child Pornography)

2. On or about June 25, 2015, within the Eastern District of New York, the defendant DANIEL USKOKOVIC did knowingly and intentionally possess matter containing one or more visual depictions, to wit: videos and images on a “Lian Li” desktop computer, a “Seagate” internal hard drive S/N 3JVASVWJ, and a “Toshiba” external hard drive S/N 4975F2SJSFD6, which visual depictions had been mailed, and shipped and transported in and affecting interstate and foreign commerce and using a means and facility of interstate and foreign commerce, and which were produced using materials which had been mailed, and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

3. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253, of: (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18, United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting or traceable to

gross profits or other proceeds obtained from the offenses of conviction; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses of conviction, or any property traceable to such property, including, but not limited to:

- a. One (1) "Lian Li" desktop computer;
- b. One (1) "Seagate" internal hard drive S/N 3JVASVWJ
- c. One (1) "Toshiba" external hard drive S/N 4975F2SJSFD6

all seized from the defendant's residence on or about June 25, 2015.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2253; Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON


KELLY T. CURRIE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2015R01077
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

DANIEL USKOKOVIC,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2),
2253 and 3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.


K. O'Person

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Michael T. Keilty, Assistant U.S. Attorney (718) 254-7528